

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: SUSAN K. RHOADS,
Debtor

CHAPTER 13
CASE NO. 17-10525-PM

Fay Servicing, LLC as Servicer for
U.S. Bank Trust National Association,
not in its individual capacity, but solely
as Trustee of LSF10 Master
Participation Trust,

Movant

vs.

SUSAN K. RHOADS,

Debtor

ANSWER TO CERTIFICATION OF DEFAULT OF
FAY SERVICING, LLC
FOR RELIEF FROM AUTOMATIC STAY

Debtor, by and through her attorney, Brenna Hope Mendelsohn, Esquire, hereby responds to this Certification of Default of Fay Servicing, LLC as Servicer for U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF10 Master Participation Trust for Relief from the Automatic Stay as follows:

1. Debtor avers that payments under the Stipulation filed with this Honorable Court are current or will be current by the hearing date and respectfully requests this Honorable Court conduct a Hearing with respect to the alleged default.

WHEREFORE, Debtors respectfully request this Honorable Court deny the Motion to Fay Servicing, LLC as Servicer for U.S. Bank Trust National Association for Relief from Automatic Stay.

Respectfully Submitted,

Dated: 12/14/21

By: /s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
Attorney for Debtor